

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

June 26, 2019

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

We write pursuant to your Order, ECF 4524, directing the parties to file “a joint letter proposing a deadline for Plaintiffs to submit a reply brief” on the first phase of Plaintiffs’ Motion to Compel directed to the Federal Bureau of Investigation (FBI), filed May 31, 2019.

The PECs and the Department of Justice have met and conferred, and agreed that Plaintiffs will have a reply of 15 pages, which shall be due on July 9, 2019. The FBI reserves the right to request an opportunity to file a sur-reply to the extent the PECs’ reply raises additional factual or legal arguments not presented in their opening brief.

The PECs further state that Plaintiffs’ reply brief shall also include their argument in response to the unauthorized opposition to Plaintiffs’ Motion filed on June 21, 2019 by the Kingdom of Saudi Arabia.

Hon. Sarah Netburn
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Respectfully submitted,

COZEN O'CONNOR

/s/ Sean P. Carter, Esquire

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On behalf of the MDL 1570 Plaintiffs'
Exec. Committee for Commercial Claims

MOTLEY RICE

/s/ Robert T. Haefele, Esquire

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On behalf of the MDL 1570 Plaintiffs'
Exec. Committee for Personal Injury and
Death Claims

KREINDLER & KREINDLER

/s/ Steven R. Pounian, Esquire

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On behalf of the MDL 1570 Plaintiffs'
Exec. Committee for Personal Injury and
Death Claims

cc: The Honorable George B. Daniels
All Counsel of Record via ECF